

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
(Newport News Division)

UNITED STATES OF AMERICA

THE HONORABLE RAYMOND A. JACKSON

v.

CRIMINAL NO. 4:24r75-001

MATTHEW IAN BRITT

MOTION FOR DOWNWARD VARIANCE FROM  
APPLICABLE SENTENCING GUIDELINES RANGE

COMES NOW your defendant, Matthew Ian Britt, by and through counsel, and respectfully moves this Honorable Court, for a downward variance from the advisory sentencing guidelines range of imprisonment in this matter; and in support of his motion states the following:

1. On October 22, 2024, the Grand Jury in the Eastern District of Virginia, Newport News Division, filed a one-count Indictment against Mr. Britt. Mr. Britt was charged in Count One of the Indictment with Attempted Coercion and Enticement of a Child, from in or about July 9, 2024 through July 12, 2024, in violation of 18 U.S.C. § 2428(a);

2. On December 11, 2024, Mr. Britt entered a plea of guilty to Count One of the Indictment in accordance with a written plea agreement with the government before the Honorable Raymond A. Jackson;

3. As outlined in Mr. Britt's Position With Respect to

Sentencing, Mr. Britt endured extreme physical, emotional and sexual abuse as a child and as an adult. PSI Report, ¶ 57 - 59;

4. Mr. Britt's resulting sentencing guideline range is 235 to 293 months. PSI Report ¶ 94;

5. Mr. Britt is respectfully requesting a sentencing variance based on the mitigating factors stated on page 9 of his psychological evaluation. ECF No. 28. (Under Seal);

6. Mr. Britt's position is that a sentence of 188 months would be sufficient, but not greater than necessary, to achieve the goals established in 18 U.S.C. § 3553(a).

WHEREFORE, Matthew Ian Britt, respectfully requests that this Court grant the relief prayed for herein.

MATTHEW IAN BRITT

By: /s/ Harry Dennis Harmon, Jr.\_\_\_\_\_  
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of May 2025, I will electronically file the foregoing document with the Clerk of Court using CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Devon E. A. Heath  
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Newport News, Virginia 23606  
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E-Mail Address: devon.heath@usdoj.gov

I hereby further certify that on the 29th day of May 2025, I will electronically mail a true copy of the foregoing document to the following non-filing user to:

Nicole Pender  
United States Probation Officer  
United States Probation Office  
600 Granby Street, Suite 200  
Norfolk, Virginia 23510  
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